

Michael Q. Eagan (CA #63479)  
Thomas H. Manulkin (CA #229630)  
LAW OFFICES OF MICHAEL Q. EAGAN  
Three Embarcadero Center  
Eighth Floor  
San Francisco, California 94111  
Telephone: (415) 765-4600  
Fax: (415) 765-4659  
E-mail: mqe@lomqe.com

Attorneys for Defendants

UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF CALIFORNIA

PERDANA CAPITAL (LABUAN) INC., a  
Malaysian Corporation,  
  
Plaintiff,  
  
v.  
  
MOHAMMAD AKRAM CHOWDRY, an  
Individual; HI-TECH VENTURE PARTNERS,  
LLC, a Delaware Limited Liability Company;  
HI-TECH ASSOCIATES, LLC, a California  
Limited Liability Company; and DOES 1-50,  
  
Defendants.

CASE NO. CV 09-01479 RS

Assigned to Hon. Richard Seeborg

**STIPULATION AND ~~PROPOSED~~  
ORDER REGARDING THE  
DISCLOSURE AND DISCOVERY OF  
EXPERT WITNESS OPINIONS**

1 IT IS HEREBY AGREED AND STIPULATED by the parties hereto, by and through  
2 their respective attorneys that are authorized to enter into this stipulation, that section 3, titled  
3 "EXPERT WITNESSES," of the Case Management Scheduling Order dated March 7, 2011 shall  
4 be amended as follows for the following reasons:

5 WHEREAS, on June 28, 2011, the parties filed a joint letter with Magistrate Judge Spero  
6 raising a number of issues related to discovery in this case;

7 WHEREAS, on July 25, 2011 Magistrate Judge Cousins signed the parties' Stipulation  
8 and Order Regarding Discovery Disputes ("Order") to resolve the issues raised in the June 28,  
9 2011 letter to Judge Spero;

10 WHEREAS, since the entry of the Order, the parties have been attempting to complete  
11 the discovery required under the Order;

12 WHEREAS, due to the delay in completing discovery the experts do not have all of the  
13 information they need to draft their respective expert opinions;

14 NOW, THEREFORE, IT IS HEREBY STIPULATED, AGREED AND  
15 RESPECTFULLY REQUESTED by the undersigned Parties, that section 3, titled "EXPERT  
16 WITNESSES," of the Case Management Scheduling Order dated March 7, 2011 shall be  
17 amended as follows:

18 3. EXPERT WITNESSES, The disclosure of expert witness opinions shall proceed  
19 as follows:

20 A. On or before January 10, 2012, plaintiff shall disclose expert testimony and  
21 reports in accordance with Federal Rule of Civil Procedure 26(a)(2).

22 B. On or before February 7, 2012, defendants shall disclose expert testimony and  
23 reports in accordance with Federal Rule of Civil Procedure 26(a)(2).

24 C. On or before March 20, 2012, all discovery of expert witnesses pursuant to  
25 Federal Rule of Civil Procedure 26(b)(4) shall be completed.

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**IT IS SO STIPULATED AND RESPECTFULLY REQUESTED.**

Dated: October 25, 2011

Respectfully submitted,

LAW OFFICES OF MICHAEL Q. EAGAN

By: \_\_\_\_\_/s/  
THOMAS H. MANULKIN

Attorneys for defendants Mohammad  
Akram Chowdry, Hi-Tech Venture Partners,  
LLC and Hi-Tech Associates, LLC

Dated: October 25, 2011

Respectfully submitted,

KAUFMAN DOLOWICH VOLUCK & GONZO

By: \_\_\_\_\_/s/  
JOSEPH KOURI  
JOSEPH J. DE HOPE, JR.

Attorneys for plaintiff Perdana Capital  
(Labaun), Inc.

I, Thomas H. Manulkin, of the Law Offices of Michael Q. Eagan, whose ID and  
password are being used to file this Stipulation and [Proposed] Order, hereby, attest, in  
accordance with General Order 45 X(B), that Joseph J. De Hope, Jr. of Kaufman Dolowich  
Voluck and Gonzo, LLP has concurred in this filing.

Dated: October 25, 2011

Respectfully submitted,

LAW OFFICES OF MICHAEL Q. EAGAN

By: \_\_\_\_\_/s/  
THOMAS H. MANULKIN

Attorneys for defendants Mohammad  
Akram Chowdry, Hi-Tech Venture Partners,  
LLC and Hi-Tech Associates, LLC

**PURSUANT TO STIPULATION, IT IS SO ORDERED**

Dated: 10/25, 2011

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA



\_\_\_\_\_  
THE HON. RICHARD SEEBORG  
UNITED STATES DISTRICT JUDGE